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June 4, 2019

VIA ECF AND BY HAND

The Honorable Pamela K. Chen
United States District Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Freeman v. HSBC Holdings plc*, 14-cv-6601-PKC-CLP (“*Freeman I*”)
Freeman v. HSBC Holdings plc, 18-cv-7359-PKC-CLP (“*Freeman II*”)
Bowman v. HSBC Holdings plc, 19-cv-2146-PKC-CLP (“*Bowman*”)

Dear Judge Chen:

On behalf of the Moving Defendants,¹ I enclose courtesy copies of the following filings and associated exhibits from *Freeman I* by the Moving Defendants, listed in this Court’s order of May 31, 2019:

- Defendants’ Joint Memorandum in Support of the Moving Defendants’ Motion to Dismiss (ECF No. 120);
- Defendant Credit Suisse AG’s Supplemental Memorandum of Law (ECF No. 121);
- HSBC Defendants and Defendant Royal Bank of Scotland N.V.’s Supplemental Memorandum of Law (ECF No. 122);
- Defendant Standard Chartered Bank’s Supplemental Memorandum of Law (ECF No. 123);

¹ The “Moving Defendants” are HSBC Holdings PLC, HSBC Bank PLC, HSBC Bank Middle East Limited, HSBC Bank USA, N.A., Barclays Bank PLC, Standard Chartered Bank, The Royal Bank of Scotland N.V., Credit Suisse AG, and Commerzbank AG.

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- Defendant Commerzbank AG's Supplemental Memorandum of Law (ECF No. 124);
- Defendants' Joint Reply (ECF No. 126);
- Defendant Commerzbank AG's Supplemental Reply (ECF No. 127);
- Defendant Credit Suisse AG's Supplemental Reply (ECF No. 128);
- HSBC Defendants and Defendant Royal Bank of Scotland N.V.'s Supplemental Reply (ECF No. 129);
- Defendant Standard Chartered Bank's Supplemental Reply (ECF No. 130);
- Moving Defendants' Joint Objections (ECF No. 174); and
- Defendants' Reply (ECF No. 184).

The Moving Defendants respectfully request that in addition to these filings, the Court consider letters filed by the Moving Defendants on the Motion to Dismiss (ECF No. 120) in *Freeman I*, which address new authorities since briefing was completed:

- Defs. Letters regarding *Kemper v. Deutsche Bank AG*, No. 18-1031, 911 F.3d 383, 2018 WL 6521588 (7th Cir. Dec. 12, 2018) (ECF Nos. 203, 205);
- Defs. Letters regarding *O'Sullivan, et al. v. Deutsche Bank AG, et al.*, 17-cv-8709 (LTS) (GWG), 2019 WL 1409446 (S.D.N.Y. Mar. 28, 2019) (ECF Nos. 217, 220).

Respectfully submitted,

/s/ Jonathan I. Blackman

Enclosures

cc: Counsel of Record (via ECF)